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WELLS FARGO BANK, N.A.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LN MANAGEMENT LLC SERIES 5204
PAINTED SANDS,

Plaintiff,

vs.

WELLS FARGO BANK, N.A.; QUIXOTE
VENTURES OPPORTUNITY FUND, LLC, a
Nevada limited liability company; and DOES 1
through 10, inclusive,

Defendants.

Case No.: 2:13-cv-01200-LDG-PAL

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
BRIEFING SCHEDULE**

(FIRST REQUEST)

WELLS FARGO BANK, N.A.

Counter Claim Plaintiff,

vs.

LN MANAGEMENT LLC SERIES 5204
PAINTED SANDS, a Nevada limited liability
company; NEVADA ASSOCIATION
SERVICES, a Nevada limited liability company;
PAINTED DESERT COMMUNITY
ASSOCIATION, a Nevada non-profit
cooperative corporation, JOHN DOES 1-20;

Counter Claim Defendants

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2 **STIPULATION AND ORDER TO EXTEND DISPOSITIVE MOTION DEADLINE**
3 **AND BRIEFING SCHEDULE**

4 Pursuant to Fed. R. Civ. P. 26(f), and Local Rules 6-1, 26-1 and 26-4, LN Management
5 LLC Series 5204 Painted Sands ("LN Mgmt") and Wells Fargo Bank, N.A. ("Wells Fargo")
6 (collectively, the "Stipulating Parties"), by and through their respective undersigned counsel of
7 record, submit this Stipulation and Proposed Order to extend the dispositive motion briefing
8 deadlines in this action. This is the Stipulating Parties' first request for extension of the
9 dispositive motion briefing schedule. The parties request that a two-week extension to allow
10 Wells Fargo to file its reply brief in support of its motion for summary judgment. Discovery
11 closed on November 26, 2018, and the Stipulating Parties are not seeking to extend or re-open
12 discovery.

13 This request to extend the dispositive motion briefing schedule is made in good faith, and
14 is not for purpose of delay or prejudice to any party. Good cause exists pursuant to Local Rule
15 26-4 to permit this extension to allow Wells Fargo to have adequate time to prepare its reply brief.
16 The requested extension will not result in undue delay or prejudice to any party, as the parties
17 previously stated in their Joint Interim Status Report [Docket No. 76] that their earliest available
18 date for trial for this matter is May 8, 2019.

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A. Proposed Schedule for Dispositive Motions

<u>EVENT</u>	<u>EXISTING DEADLINE</u>	<u>NEW DEADLINE</u>
Dispositive motions	January 4, 2019	Closed
Response to dispositive motions	January 25, 2019	Closed
Reply brief in support of dispositive motion	February 8, 2019	February 22, 2019

Dated this 4th day of February, 2019.Dated this 4th day of February, 2019.

SNELL & WILMER L.L.P.

/s/ Kerry P. Faughnan/s/ Tanya N. Lewis

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Defendant LN Management LLC Series 5204
Painted Sands*

*Attorneys for Defendant/Counterclaim Plaintiff
Wells Fargo Bank, N.A*

*(electronic signature affixed with permission)*ORDER

IT IS SO ORDERED:

UNITED STATES DISTRICT COURT JUDGE

DATED: February 11, 2019